

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

RUBY FREEMAN and WANDREA' MOSS,

Plaintiffs,

v.

RUDOLPH W. GIULIANI,

No. 24-mc-353 (LJL)

Defendant,

v.

ANDREW H. GIULIANI,

Intervenor-Defendant.

**PLAINTIFFS' PRETRIAL DISCLOSURES REGARDING CLAIMS ASSERTED BY
INTERVENOR-DEFENDANT ANDREW H. GIULIANI**

Plaintiffs Ruby Freeman and Wandrea' ArShaye Moss ("Plaintiffs") provide the following disclosures pursuant to Federal Rules of Civil Procedure Rule 26(a)(3) limited to the claims asserted by Intervenor-Defendant Andrew H. Giuliani, which are scheduled to be heard on January 16, 2025. Plaintiffs reserve the right to supplement these disclosures.

I. Trial Witnesses

Plaintiffs may call the following witnesses at trial:

| Witness Name | Address and Telephone | Will Call/May Call |
|---------------------|---|---------------------------|
| Rudolph W. Giuliani | c/o Joseph M. Cammarata, Esq. Cammarata & De Meyer, P.C. 456 Arlene Street Staten Island, New York 10314 (718) 477-0020 | Will call |

II. Deposition Designations

To date, there have been no depositions. The deposition of Mr. Andrew Giuliani is scheduled for December 19, 2024. The deposition of Mr. Rudolph Giuliani is scheduled for December 27, 2024. The deposition of Mr. Sean Kalin is scheduled for December 31, 2024. Plaintiffs will provide any deposition designations they intend to use at trial following the completion of these depositions.

III. Plaintiffs' Trial Exhibits

The documents Plaintiffs expect to offer at trial are attached hereto as Exhibit A.

Dated: December 17, 2024

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*Attorneys for Plaintiffs Ruby Freeman and
 Wandrea' Moss*

EXHIBIT A

| Exhibit Number | Description | Will/May Offer |
|-----------------------|--|-----------------------|
| PTX-001 | Photograph of New York Yankees World Series Ring (On Hand) | May Offer |
| PTX-002 | Photograph of Side Profile of New York Yankees World Series Ring (On Hand) | May Offer |
| PTX-003 | 2007.05.01 – Wayne Barrett, <i>The Yankees's Clean-Up Man</i> , The Village Voice (May 1, 2007) | May Offer |
| PTX-004 | 2007.05.12 – Jim Dwyer, <i>The Rings of Giuliani</i> , New York Times (May 12, 2007) | May Offer |
| PTX-005 | 2018.04.26 – Photograph of Andrew Giuliani, Rudolph W. Giuliani and Unidentified Female with New York Yankees World Series Rings | May Offer |
| PTX-006 | 2018.04.26 – Photograph of Andrew Giuliani, Rudolph W. Giuliani and Unidentified Female with New York Yankees World Series Rings | May Offer |
| PTX-007 | 2018.12.16 – Alan Smith, <i>Rudy claims Michael Cohen hush payments, possible Russia collusion 'not a crime'</i> , NBC News (December 16, 2018) | May Offer |
| PTX-008 | 2024.01.26 – Text Messages between Andrew Giuliani and Gary F. | May Offer |
| PTX-009 | 2024.01.26 – Text Messages between Andrew Giuliani and Gary F. | May Offer |
| PTX-010 | 2024.01.26 – Affidavit of Rudolph W. Giuliani Pursuant to Local Rule 1007-1(B) attaching Schedule A/B (Property) and Schedule C (The Property You Claim as Exempt), <i>In re Giuliani</i> (No. 23-12055-shl Bankr. S.D.N.Y.) | May Offer |
| PTX-011 | 2024.02.27 – Schedule A/B (Property) and Schedule G (Executory Contracts and Unexpired Leases), <i>In re Giuliani</i> (No. 23-12055-shl Bankr. S.D.N.Y.) | May Offer |
| PTX-012 | 2024.05.25 – Delta Airlines Flight Receipt for Andrew Giuliani dated May 25, 2024 | May Offer |
| PTX-013 | 2024.10.08 – Memorandum of Law in Support of Andrew H. Giuliani's Motion to Intervene as Defendant, <i>Freeman et al. v. Giuliani et al.</i> (No. 24-MC-353-LJL S.D.N.Y.) | May Offer |

| Exhibit Number | Description | Will/May Offer |
|-----------------------|--|-----------------------|
| PTX-014 | 2024.10.08 – Declaration of Scott B. McBride in Support of Andrew H. Giuliani's Motion to Intervene as Defendant, <i>Freeman et al. v. Giuliani et al.</i> (No. 24-MC-353-LJL S.D.N.Y.) | May Offer |
| PTX-015 | 2024.10.08 – Declaration of Andrew H. Giuliani in Support of His Motion to Intervene as Defendant, <i>Freeman et al. v. Giuliani et al.</i> (No. 24-MC-353-LJL S.D.N.Y.) | May Offer |
| PTX-016 | 2024.10.08 – Exhibit A to Declaration of Andrew H. Giuliani in Support of His Motion to Intervene as Defendant, <i>Freeman et al. v. Giuliani et al.</i> (No. 24-MC-353-LJL S.D.N.Y.) | May Offer |
| PTX-017 | 2024.10.27 – Intervenor Defendant Andrew H. Giuliani's Responses and Objections to Plaintiffs First set of Document Requests, <i>Freeman et al. v. Giuliani et al.</i> (No. 24-MC-353-LJL S.D.N.Y.) | May Offer |
| PTX-018 | 2024.10.27 – Intervenor Defendant Andrew H. Giuliani's Responses and Objections to Plaintiffs First Set of Interrogatories, <i>Freeman et al. v. Giuliani et al.</i> (No. 24-MC-353-LJL S.D.N.Y.) | May Offer |
| PTX-019 | 2024.10.27 – Intervenor Defendant Andrew H. Giuliani's Responses and Objections to Plaintiffs' Information Subpoena with Restraining Notice Pursuant to C.P.L.R. §§ 5222 and 5224, <i>Freeman et al. v. Giuliani et al.</i> (No. 24-MC-353-LJL S.D.N.Y.) | May Offer |
| PTX-020 | 2018.06.08 – Photograph of New York Yankees World Series Ring (On Hand) | May Offer |
| PTX-021 | 2019.10.04 – Rudolph W. Giuliani X Post with Photograph of Rudolph W. Giuliani and Unidentified Man with New York Yankees World Series Ring (On Hand) | May Offer |
| PTX-022 | 2020.07.01 – Photograph of New York Yankees World Series Ring (On Hand) | May Offer |
| PTX-023 | 2022.06.07 – Photograph of Rudolph W. Giuliani and Andrew Giuliani with Side Profile of New York Yankees World Series Ring (On Hand) | May Offer |
| PTX-024 | 2022.06.07 – Photograph of New York Yankees World Series Ring (On Hand) | May Offer |
| PTX-025 | 2022.06.24 – Bill Mahoney, <i>Rudy Giuliani's Pitch to New York: Hire My Son</i> , Politico | May Offer |
| PTX-026 | 2022.10.15 – Rudolph W. Giuliani X Post with Photograph of New York Yankees World Series Ring (On Hand) | May Offer |

| Exhibit Number | Description | Will/May Offer |
|----------------|--|----------------|
| PTX-027 | 2024.10.09 – Chris Malone Méndez, <i>Yankees World Series Rings Embroiled in Rudy Giuliani Defamation Lawsuit</i> , Men’s Journal, with Photograph of New York Yankees World Series Ring (On Hand) | May Offer |
| PTX-028 | 2018.06.05 – Eli Watkins, <i>Giuliani Predicts His Work for Trump will not Harm his Legacy</i> , CNN, with Photograph of New York Yankees World Series Ring (On Hand) | May Offer |